

WALTER E. DEUCHLER ASSOCIATES INC.

Consulting Engineers

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AURORA, ILLINOIS 60506

March 10, 2010

Ms. Dawn Thompson
CMAP Wastewater Committee
Chicago Metropolitan Planning Agency
233 S. Wacker Drive, Suite 800
Sears Tower
Chicago, Illinois 60606

**RE: Illinois American Water Company
WWTP Expansion
Kendall County, Illinois
WEDA Project No. 111-07070-00
Water Quality Review #10-WQ-005**

Dear Ms. Thompson:

On behalf of the Fox Metro Water Reclamation District (FMWRD), we submit the following comments regarding the proposed Valley Marina Water Reclamation Facility (Valley Marina) Expansion (#10-WQ-005).

As noted in the application, Valley Marina's service area is within FMWRD's facility planning area. FMWRD is a regional wastewater treatment facility providing wastewater services to all the surrounding areas outside of Valley Marina's designated service area. Since both facilities discharge to the Fox River and their respective outfalls are within one mile of each other on the west side of the river, we strongly believe that Valley Marina should be required to meet the same NPDES concentration limits as FMWRD.

As part of their permit application, Valley Marina submitted to CMAP a report entitled "Valley Marina Water Reclamation Facility Improvements" (Strand Associates, Inc., January 2010). In this report, Section 4 discusses Discharge Permitting Issues. As proposed in this section, the NPDES effluent concentration limits for the Valley Marina are more than two times greater than FMWRD existing permit limits (see the attached **Table 1**). This means that effluent discharged from the Valley Marina treatment facility to the Fox River will introduce more than twice the mass loading (in pounds per day) than if the same flow was treated at FMWRD (see **Table 2**). Even if Valley Marina keeps their yearly mass loading at their current levels for BOD and total suspended solids (TSS) as proposed in Section 4, they will still have a larger mass loading for their effluent than if FMWRD were to treat the same wastewater.

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In summary, if Valley Marina is allowed to proceed with expanding their treatment facilities, they should be required to meet the lower effluent limits that are within FMWRD's NPDES permit. Should you have any questions or require additional information relative to this matter, please do not hesitate to contact the undersigned at (630)897-4651.

Very truly yours,
WALTER E. DEUCHLER ASSOCIATES, INC.



Carrie Carter
Project Engineer

CJC/cc

Table 1 and Table 2

cc: Tom Muth (FMWRD)
Philippe Moreau (WEDA)
John Frerich (WEDA)
Richard Hermann (Illinois American Water Company)

Table 1
Comparison of NPDES Effluent Limits FMWRD vs. Valley Marina

Parameter	Valley Marina Average Monthly (mg/L)	Valley Marina Average Weekly (mg/L)	Valley Marina Daily Maximum (mg/L)	FMWRD Average Monthly (mg/L)	FMWRD Average Weekly (mg/L)	FMWRD Daily Maximum (mg/L)
CBOD	25	40		10		20
TSS	30	45		12		24
Ammonia Nitrogen						
March-May/Sept-Oct	3.3		8.5	1.5	3.8	4.4
June-August	1.5		6.0	1.5		3.2
Nov-Feb	4.0		14.9	2.0		4.4

Table 2
Comparison of Loadings to Fox River FMWRD vs. Valley Marina
(Based on Daily Average Flow and Proposed NPDES Limits)

Parameter	Valley Marina Average Daily (lbs/day)	Valley Marina Proposed Yearly * (lbs)	Valley Marina Average Monthly (lbs/day)	FMWRD Average Daily (lbs/day)	FMWRD Estimated Yearly (pounds)	FMWRD Average Monthly (lbs/day)
CBOD	88	19,000		35	12,785	
TSS	105	22,800		42	15,342	
Ammonia Nitrogen						
March-May/Sept-Oct			11.6			5.3
June-August			5.3			5.3
Nov-Feb			14.0			7.0

- * Proposed Yearly for Valley Marina are based on discussion included in Section 4.03 (Valley Marina Water Reclamation Facility (WRF) Improvements (January 2010) and are based on keeping mass permit limits at the current permitted levels. FMWRD mass loadings are based on their current NPDES permit.
- ** Ammonia Loads for Valley Marina are based on the effluent concentration limits shown on Table 4.03-1 (Valley Marina Water Reclamation Facility (WRF) Improvements (January 2010). FMWRD mass loadings are based on their current NPDES permit.